INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We make Indiana a cleaner, healthier place to live.

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100 North Senate Avenue
P. O. Box 6015
Indianapolis, Indiana 46206-6015
(317) 232-8603
(800) 451-6027
www.IN.gov/idem

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) OFFICE OF AIR QUALITY

Mignone Communications, Inc.
880 East State Street
Huntington, Indiana 46750

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: F 069-16460-00059	
Issued by:Original signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: July 21, 2003 Expiration Date: July 21, 2008

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in Conditions A.1, A.3, and A.4 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a stationary commercial printing source.

Authorized individual:	President
Source Address:	880 East State Street, Huntington, Indiana 46750
Mailing Address:	880 East State Street, Huntington, Indiana 46750
General Source Phone:	(260) 358-0266
SIC Code:	2752
Source Location Status:	Huntington County Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD Rules; Minor Source, Section 112 of the Clean Air Act

A.2 Source Definition [326 IAC 2-8-1] [326 IAC 2-7-1(22)]

This commercial printing source consists of a source with an on-site contractor:

(a) Print Support, Inc., the supporting operation, is located at 860 East State Street, Huntington, Indiana 46750; and

(b) Mignone Communications, Inc., the primary operation, is located at 880 East State Street, Huntington, Indiana 46750.

IDEM has determined that Print Support, Inc. and Mignone Communications, Inc. are under the common control of Mignone Communications, Inc. These two (2) plants are considered one (1) source because they are located on contiguous properties, have the same SIC code, the majority of product from one company is input to the other for further processing, and officers of both companies are directly involved with the day to day operations of both companies. Therefore, the term “source” in the FESOP documents refers to both Print Support, Inc. and Mignone Communications, Inc. as one source effective from the date of issuance of MSOP 069-14670-00059, issued on November 12, 2001. One combined FESOP will be issued to Print Support, Inc. and Mignone Communications, Inc. under the name Mignone Communications, Inc.

A.3 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

This stationary source consists of the following emission units and pollution control devices:

(a) One (1) five-color heatset lithographic web press, identified as Press #1, constructed in 1998, equipped with a 2.5 million British thermal units per hour catalytic oxidizer for VOC control, exhausting to Stack 1, capacity: 1,400 feet per minute.

(b) One (1) natural gas-fired dryer, identified as Dryer on Press #1, constructed in 1998, rated at 2.422 million British thermal units per hour.

(c) One (1) five-color non-heatset lithographic web press, identified as Press #2 and operated by Print Support, Inc., constructed in 2001, capacity: 2,844 feet per minute.

(d) One (1) five-color heatset lithographic web press, identified as Press #3, equipped with a 2.5 million British thermal units per hour catalytic oxidizer for VOC control, exhausting to Stack 2, capacity: 1,500 feet per minute.

(e) One (1) natural gas-fired dryer, identified as Dryer on Press #3, rated at 2.422 million British thermal units per hour.

A.4 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

(a) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device, such as a bag filter or cyclone, including bindery and finish trimmers, capacity: 25,848 feet per hour. [326 IAC 6-3-2]

(b) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour, including one (1) natural gas comfort heater rated at 0.1309 million British thermal units per hour, and the combustion from the dryers and incinerators listed as significant.

(c) One (1) small label press (one (1) ink jet printer), with negligible VOC emissions.

(d) Pre-press operations, including plate processing and film developing with negligible VOC emissions.

(e) One (1) bailer.

A.5 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) for a Federally Enforceable State Operating Permit (FESOP).

A.6 Prior Permits Superseded [326 IAC 2-1.1-9.5]

(a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either

(1) incorporated as originally stated,

(2) revised, or

(3) deleted

by this permit.

(b) All previous registrations and permits are superseded by this permit.

SECTION B GENERAL CONDITIONS

B.1 Permit No Defense [IC 13]

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

B.2 Definitions [326 IAC 2-8-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2, and 326 IAC 2-7) shall prevail.

B.3 Permit Term [326 IAC 2-8-4(2)] [326 IAC 2-1.1-9.5]

This permit is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

B.4 Enforceability [326 IAC 2-8-6]

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

B.5 Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

B.6 Severability [326 IAC 2-8-4(4)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.7 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

This permit does not convey any property rights of any sort, or any exclusive privilege.

B.8 Duty to Provide Information [326 IAC 2-8-4(5)(E)]

(a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit.

(b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1 When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.9 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAQ may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.10 Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]

(a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for:

(1) Enforcement action;

(2) Permit termination, revocation and reissuance, or modification; and

(3) Denial of a permit renewal application.

(b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

(c) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

B.11 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]

(a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an authorized individual of truth, accuracy, and completeness. This certification, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.

(c) An authorized individual is defined at 326 IAC 2-1.1-1(1).

B.12 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

(a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

(b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(c) The annual compliance certification report shall include the following:

(1) The appropriate identification of each term or condition of this permit that is the basis of the certification;

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

(4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and

(5) Such other facts as specified in Sections D of this permit, IDEM, OAQ, may require to determine the compliance status of the source.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.13 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The PMP extension notification does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) The Permittee shall implement the PMPs, including any required record keeping, as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.

(c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMP does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation, Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.14 Emergency Provisions [326 IAC 2-8-12]

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-8-12.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes the following:

(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

(2) The permitted facility was at the time being properly operated;

(3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone No.: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section)
or,
Telephone No.: 317-233-5674 (ask for Compliance Section)
Facsimile No.: 317-233-5967

(5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

(A) A description of the emergency;

(B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

(6) The Permittee immediately took all reasonable steps to correct the emergency.

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.

(f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.

(g) Operations may continue during an emergency only if the following conditions are met:

(1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

(2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:

(A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and

(B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

(h) Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

(a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provision), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

(b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not

stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:

(1) That this permit contains a material mistake.

(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]

(c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.17 Permit Renewal [326 IAC 2-8-3(h)]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, IN 46206-6015

(b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]

(1) A timely renewal application is one that is:

(A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

(B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(2) If IDEM, OAQ upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.

(c) Right to Operate After Application for Renewal [326 IAC 2-8-9]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as needed to process the application.

B.18 Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]

(a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application shall be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

(d) No permit amendment or modification is required for the addition, operation or removal of a nonroad engine, as defined in 40 CFR 89.2.

B.19 Operational Flexibility [326 IAC 2-8-15] [326 IAC 2-8-11.1]

(a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without prior permit revision, if each of the following conditions is met:

(1) The changes are not modifications under any provision of Title I of the Clean Air Act;

(2) Any approval required by 326 IAC 2-8-11.1 has been obtained;

(3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

(5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-8-15(b) through (d) and makes such records available, upon reasonable request, to public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-8-15(b)(2), (c)(1), and (d).

(b) Emission Trades [326 IAC 2-8-15(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).

(c) Alternative Operating Scenarios [326 IAC 2-8-15(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ or U.S. EPA is required.

B.20 Permit Revision Requirement [326 IAC 2-8-11.1]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-8-11.1.

B.21 Inspection and Entry [326 IAC 2-8-5(a)(2)] [IC 13-14-2-2] [IC 13-30-3-1]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

(a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

(c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.22 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

(a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

(b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][326 IAC 2-1.1-7]

(a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.

(b) Failure to pay may result in administrative enforcement action, or revocation of this permit.

(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4320 (ask for OAQ, I/M & Billing Section), to determine the appropriate permit fee.

B.24 Advanced Source Modification Approval [326 IAC 2-8-4(11)] [326 IAC 2-1.1-9]

(a) The requirements to obtain a permit revision under 326 IAC 2-8-11.1 are satisfied by this permit for the proposed emission units, control equipment or insignificant activities in Sections A.2 and A.3.

(b) Pursuant to 326 IAC 2-1.1-9 any permit authorizing construction may be revoked if construction of the emission unit has not commenced within eighteen (18) months from the date of issuance of the permit, or if during the construction work is suspended for a continuous period of one (1) year or more.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emissions Limitations and Standards [326 IAC 2-8-4(1)]

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [40 CFR 52 Subpart P] [326 IAC 6-3-2]

(a) Pursuant to 40 CFR 52 Subpart P, particulate matter emissions from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

(b) Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.

C.2 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

(a) Pursuant to 326 IAC 2-8:

(1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period. This limitation shall also make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable;

(2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and

(3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

(b) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.

(c) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.3 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity

monitor) in a six (6) hour period.

C.4 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.

C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and in 326 IAC 9-1-2.

C.6 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

C.7 Operation of Equipment [326 IAC 2-8-5(a)(4)]

Except as otherwise provided by statute, rule or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1 emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) Demolition and renovation
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).

(g) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable.

Testing Requirements [326 IAC 2-8-4(3)]

C.9 Performance Testing [326 IAC 3-6]

(a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

(c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.10 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring

or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.11 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]

Unless otherwise specified in this permit, all monitoring and recordkeeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule with full justification of the reasons for inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Unless otherwise specified in the approval for the new emissions unit, compliance monitoring for new emission units or emission units added through a permit revision shall be implemented when operation begins.

C.12 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing performed required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63 or other approved methods as specified in this permit.

C.13 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)] [326 IAC 2-8-5(1)]

(a) Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (±2%) of full scale reading.

(b) Whenever a condition in this permit requires the measurement of a temperature, flow rate, or pH level, the instrument employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (±2%) of full scale reading.

(c) The Preventive Maintenance Plan for the pH meter shall include calibration using known standards. The frequency of calibration shall be adjusted such that the typical error found at calibration is less than one pH point.

(d) The Permittee may request the IDEM, OAQ approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters.

Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.14 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]

If a regulated substance, as defined in 40 CFR 68, is present at a source in more than a threshold quantity, the source must comply with the applicable requirements of 40 CFR 68.

C.15 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-8-4] [326 IAC 2-8-5]

(a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and is comprised of:

(1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected time frame for taking reasonable response steps.

(2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.

(b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:

(1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or

(2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.

(3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.

(4) Failure to take reasonable response steps shall be considered a deviation from the permit.

(c) The Permittee is not required to take any further response steps for any of the following reasons:

(1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.

(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied.

(3) An automatic measurement was taken when the process was not operating.

(4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.

(d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.

(e) The Permittee shall record all instances when, in accordance with Section D, response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-8-12 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

(f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4] [326 IAC 2-8-5]

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.

(c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Recordkeeping and Reporting Requirements [326 IAC 2-8-4(3)]

C.17 General Recordkeeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

(a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

(b) Unless otherwise specified in this permit, all recordkeeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.18 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

(a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be

submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC2-1.1-1(1).

(b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(e) The first report covered the period commencing on the date of issuance of the original FESOP and ended on the last day of the reporting period. All subsequent reporting periods shall be based on calendar years.

Stratospheric Ozone Protection

C.19 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

(a) Persons opening appliances for maintenance, service, repair or disposal must comply with the required practices pursuant to 40 CFR 82.156

(b) Equipment used during the maintenance, service, repair or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

(c) Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]: Printing Presses

(a) One (1) five-color heatset lithographic web press, identified as Press #1, constructed in 1998, equipped with a 2.5 million British thermal units per hour catalytic oxidizer for VOC control, exhausting to Stack 1, capacity: 1,400 feet per minute.

(b) One (1) natural gas-fired dryer, identified as Dryer on Press #1, constructed in 1998, rated at 2.422 million British thermal units per hour.

(c) One (1) five-color non-heatset lithographic web press, identified as Press #2 and operated by Print Support, Inc., constructed in 2001, capacity: 2,844 feet per minute.

(d) One (1) five-color heatset lithographic web press, identified as Press #3, equipped with a 2.5 million British thermal units per hour catalytic oxidizer for VOC control, exhausting to Stack 2, capacity: 1,500 feet per minute.

(e) One (1) natural gas-fired dryer, identified as Dryer on Press #3, rated at 2.422 million British thermal units per hour.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1 AND 326 IAC 2-8-11.1, WITH CONDITIONS LISTED BELOW.

Construction Conditions

General Construction Conditions

D.1.1 Permit No Defense

This permit to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

Effective Date of the Permit

D.1.2 Effective Date of the Permit [IC13-15-5-3]

Pursuant to IC 13-15-5-3, this section of this permit becomes effective upon its issuance.

D.1.3 Modification to Construction Conditions [326 IAC 2]

All requirements of these construction conditions shall remain in effect unless modified in a manner consistent with procedures established for revisions pursuant to 326 IAC 2.

Operation Conditions

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.1.4 Volatile Organic Compounds (VOC) [326 IAC 8-2-5]

Pursuant to 326 IAC 8-2-5, the owner or operator shall not allow the discharge into the atmosphere of VOC in excess of thirty-five hundredths (0.35) kilograms per liter of coating (two and nine tenths (2.9) pounds per gallon), excluding water, from each of the printing presses.

(a) Pursuant to 326 IAC 8-2-5, the VOC content of the ink used at the one (1) non-heatset offset lithographic printing press (Press #2) shall be less than 2.9 pounds of VOC per gallon of coating less water.

(b) Pursuant to 326 IAC 8-1-2 (b), the VOC emissions from Presses #1 and #3 shall be limited to no greater than the equivalent emissions, expressed as pounds of VOC per gallon of coating solids, allowed in (a).

This equivalency was determined by the following equation:

$$E = L / (1 - (L/D))$$

Where

L= Applicable emission limit from 326 IAC 8 in pounds of VOC per gallon of coating;
D= Density of VOC in coating in pounds per gallon of VOC;
E= Equivalent emission limit in pounds of VOC per gallon of coating solids as applied.

(c) Actual solvent density shall be used to determine compliance of the surface coating operation using the compliance methods in 326 IAC 8-1-2 (a).

The pounds of VOC per gallon of coating solids shall be limited to less than 4.50 pounds VOC per gallon of coating solids at Presses #1 and #3.

(d) Pursuant to 326 IAC 8-1-2(c) the overall control efficiency of the catalytic oxidizers for Presses #1 and #3 shall be no less than the equivalent overall efficiency calculated by the following equation:

$$O = \frac{V - E}{V} \times 100$$

Where:

V = The actual VOC content of the coating or, if multiple coatings are used, the daily weighted average VOC content of all coatings, as applied to the subject coating line as determined by the applicable test methods and procedures specified in 326 IAC 8-1-4 in units of pounds of VOC per gallon of coating solids as applied.
E = Equivalent emission limit in pounds of VOC per gallon of coating solids as applied.
O = Equivalent overall efficiency of the capture system and control device as a percentage.

The overall efficiency of the catalytic oxidizers shall be greater than 46.5%.

D.1.5 FESOP and PSD Minor Limit [326 IAC 2-2] [326 IAC 2-8-4]

Pursuant to 326 IAC 2-8-4, the potential to emit VOC from the total of the three (3) presses (Press #1, Press #2 and Press #3) shall be limited to less than 99.0 tons per year. This limit shall be achieved by limiting the VOC delivered to the applicators at the presses, such that the potential to emit VOC from these facilities shall be less than 99.0 tons per twelve (12) consecutive month period, with compliance determined at the end of each month, and limiting the overall control efficiency of the catalytic oxidizers to no less than seventy-one percent (71%). This will limit the potential to emit VOC from the entire source to less than 100 tons per year. Therefore, the requirements of 326 IAC 2-7, Part 70, and 326 IAC 2-2, PSD, are not applicable.

D.1.6 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and their control devices.

Compliance Determination Requirements

D.1.7 Volatile Organic Compounds (VOC) [326 IAC 8-1-2]

Pursuant to 326 IAC 8-1-2(a), the Permittee shall operate the catalytic oxidizers to achieve compliance with Conditions D.1.4 and D.1.5.

D.1.8 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

(a) Pursuant to MSOP 069-14670-00059, issued on November 12, 2001, during the period between June 15, 2004 and December 15, 2005, the Permittee shall perform VOC and operating temperature testing utilizing Methods 25 (40 CFR 60, Appendix A) for VOC or other methods as approved by the Commissioner, in order to demonstrate compliance with Conditions D.1.4 and D.1.5 for the catalytic oxidizer controlling Press #1. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing.

(b) Within one hundred and eighty (180) days after initial startup, the Permittee shall perform VOC and operating temperature testing utilizing Methods 25 (40 CFR 60, Appendix A) for VOC or other methods as approved by the Commissioner, in order to demonstrate compliance with Conditions D.1.4 and D.1.5 for the catalytic oxidizer controlling Press #3. This test shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing.

D.1.9 Volatile Organic Compounds (VOC) Emissions

Compliance with Condition D.1.5 shall be demonstrated within 30 days of the end of each month. This shall be based on the total volatile organic compound emitted for the previous month, and adding it to previous 11 months total VOC emitted so as to arrive at VOC emissions for the most recent 12 consecutive month period. The VOC emissions for a month can be arrived at using the following equation for VOC usage:

VOC emitted (tons) = [VOC input at Presses #1 and #3 (tons) X 0.80 flash off x 0.29 emitted after control] + [VOC input at Press #2 (tons) X 0.05 flash off] + [VOC usage from all cleaners and solvents (tons)]

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.1.10 Catalytic Oxidizer Temperature

(a) A continuous monitoring system shall be calibrated, maintained, and operated on the catalytic oxidizer controlling emissions from Press #1 for measuring operating temperature. The output of this system shall be recorded as an hourly average. The Permittee shall take appropriate response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports whenever the hourly average temperature of the catalytic oxidizer is below 642EF. The temperature correlates to an overall VOC control efficiency of 98% based on the stack capture and destruction efficiency test conducted on June 15, 1999. An hourly average temperature that is below 642EF is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

(b) A continuous monitoring system shall be calibrated, maintained, and operated on the catalytic oxidizer controlling emissions from Press #3 for measuring operating temperature. The

output of this system shall be recorded as an hourly average. From the date of issuance of this permit until the approved stack test results are available, the Permittee shall take appropriate response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports whenever the hourly average temperature of the catalytic oxidizer is below 1,400EF. An hourly average temperature that is below 1,400EF is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

(c) The Permittee shall determine the hourly average temperature from the most recent valid stack test that demonstrates compliance with limits in Conditions D.1.4 and D.1.5, as approved by IDEM.

(d) On and after the date the approved stack test results are available, the Permittee shall take appropriate response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports whenever the hourly average temperature of the catalytic oxidizer is below the hourly average temperature as observed during the compliant stack test. An hourly average temperature that is below the hourly average temperature as observed during the compliant stack test is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

D.1.11 Parametric Monitoring

(a) The Permittee shall determine fan amperage or duct pressure from the most recent valid stack tests that demonstrate compliance with limits in Conditions D.1.4 and D.1.5, as approved by IDEM.

(b) The duct pressure or fan amperage shall be observed at least once per day for each catalytic oxidizer when the catalytic oxidizer is in operation. When for any one reading, the duct pressure or fan amperage is outside the normal range as established in most recent compliant stack test, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports. A reading that is outside the range as established in the most recent compliant stack test is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

Recordkeeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.1.12 Recordkeeping Requirements

(a) To document compliance with Conditions D.1.4, D.1.5, D.1.10 and D.1.11, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC usage and emission limits established in Conditions D.1.4 and D.1.5.

(1) The VOC content of each coating material and solvent used less water.

(2) The amount of coating material and solvent used on a monthly basis.

(A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

(B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(3) The monthly cleanup solvent usage;

(4) The total VOC usage for each month at each press;

(5) The continuous temperature records (on an hourly average basis) for each catalytic oxidizer and the hourly average temperature used to demonstrate compliance during the most recent compliant stack tests; and

(6) Daily records of the duct pressure or fan amperage for each catalytic oxidizer.

(b) All records shall be maintained in accordance with Section C - General Recordkeeping Requirements, of this permit.

D.1.13 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.5 shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]: Insignificant Activities

(a) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device, such as a bag filter or cyclone, including bindery and finish trimmers, capacity: 25,848 feet per hour. [326 IAC 6-3-2]

(b) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour, including one (1) natural gas comfort heater rated at 0.1309 million British thermal units per hour, and the combustion from the dryers and incinerators listed as significant.

(c) One (1) small label press (one (1) ink jet printer), with negligible VOC emissions.

(d) Pre-press operations, including plate processing and film developing with negligible VOC emissions.

(e) One (1) bailer.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.2.1 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the trimmers shall not exceed 3.14 pounds per hour when operating at a process weight rate of 1,340 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

Compliance Determination Requirement

D.2.2 Particulate Control

In order to comply with D.2.1, the control equipment for particulate control shall be in operation and control emissions from the trimmers at all times that the trimmers are in operation.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) CERTIFICATION

Source Name: Mignone Communications, Inc.
Source Address: 880 East State Street, Huntington, Indiana 46750
Mailing Address: 880 East State Street, Huntington, Indiana 46750
FESOP No.: F 069-16460-00059

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

9 Annual Compliance Certification Letter

9 Test Result (specify) _____

9 Report (specify) _____

9 Notification (specify) _____

9 Affidavit (specify) _____

9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
Signature:
Printed Name:
Title/Position:
Phone:
Date:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY

COMPLIANCE BRANCH
100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY OCCURRENCE REPORT

Source Name: Mignone Communications, Inc.
Source Address: 880 East State Street, Huntington, Indiana 46750
Mailing Address: 880 East State Street, Huntington, Indiana 46750
FESOP No.: F 069-16460-00059

This form consists of 2 pages **Page 1 of 2**

9 This is an emergency as defined in 326 IAC 2-7-1(12)
- The Permittee must notify the Office of Air Quality (OAQ), within four (**4**) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
- The Permittee must submit notice in writing or by facsimile within two (**2**) working days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency:
Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A **Page 2 of 2**

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO_2, VOC, NO_X, CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

FESOP Quarterly Report

Source Name: Mignone Communications, Inc.
Source Address: 880 East State Street, Huntington, Indiana 46750
Mailing Address: 880 East State Street, Huntington, Indiana 46750
FESOP No.: F 069-16460-00059
Facility: Presses #1, #2 and #3
Parameter: VOC emissions
Limit: 99.0 tons per twelve (12) consecutive month period, total, with compliance determined at the end of each month, based on the following equation:

VOC emitted (tons) = [VOC input at Presses #1 and #3 (tons) X 0.80 flash off x (0.29 emitted after control)] + [VOC input at Press #2 (tons) X 0.05 flash off] + [VOC usage from all cleaners and solvents (tons)]

YEAR: _____

Month	VOC Emissions (tons)	VOC Emissions (tons)	VOC Emissions (tons)
	This Month	Previous 11 Months	12 Month Total

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name: Mignone Communications, Inc.
Source Address: 880 East State Street, Huntington, Indiana 46750
Mailing Address: 880 East State Street, Huntington, Indiana 46750
FESOP No.: F 069-16460-00059

Months: _____ to _____ Year: _____

This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Page 2 of 2

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: ____________________

Form Completed By: ________________________________

Title/Position: ________________________________

Date: ________________________________

Phone: ________________________________

Attach a signed certification to complete this report.

Indiana Department of Environmental Management
Office of Air Quality

Addendum to the
Technical Support Document for Federally Enforceable State Operating Permit (FESOP)

Source Name: **Mignone Communications, Inc.**
Source Location: **880 East State Street, Huntington, Indiana 46750**
County: **Huntington**
SIC Code: **2752**
Operation Permit No.: **F 069-16460-00059**
Permit Reviewer: **CarrieAnn Paukowits**

On June 13, 2003, the Office of Air Quality (OAQ) had a notice published in the Herald Press, Huntington, Indiana, stating that Mignone Communications, Inc., had applied for a Federally Enforceable State Operating Permit (FESOP) to operate a commercial printing source with catalytic oxidizers as control. The notice also stated that OAQ proposed to issue a FESOP for this operation and provided information on how the public could review the proposed FESOP and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this FESOP should be issued as proposed.

On July 11, 2003, Julie Capasso of EPA, Region V, submitted comments on the proposed FESOP. The comments are as follows (The permit language, if changed, has deleted language as ~~strikeouts~~ and new language **bolded.**):

Comment 1:

D.1.4 on page 23 of 34:

"Pursuant to 8-2-5, the owner... (0.35) kilograms per liter of coating (two and nine tenths (2.9) pounds per gallon), excluding water, from the printing presses"

Please specify whether this per liter amount is relative to VOC in each coating or an average sum of VOCs from all coatings from each press separately, or an average sum of VOCs from all three presses combined...

Response 1:

The specific requirements for each press are listed in (a) through (d) of Condition D.1.4. In order to clarify that the limit is for each press separately, Condition D.1.4 is revised as follows:

D.1.4 Volatile Organic Compounds (VOC) [326 IAC 8-2-5]

Pursuant to 326 IAC 8-2-5, the owner or operator shall not allow the discharge into the atmosphere of VOC in excess of thirty-five hundredths (0.35) kilograms per liter of coating (two and nine tenths (2.9) pounds per gallon), excluding water, from **each of** the printing presses.

(a) Pursuant to 326 IAC 8-2-5, the VOC content of the ink used at the one (1) non-heatset offset lithographic printing press (Press #2) shall be less than 2.9 pounds of VOC per gallon of coating less water.

(b) Pursuant to 326 IAC 8-1-2 (b), the VOC emissions from Presses #1 and #3 shall be limited to no greater than the equivalent emissions, expressed as pounds of VOC per gallon of coating solids, allowed in (a).

This equivalency was determined by the following equation:

E = L / (1 - (L/D))

Where

L= Applicable emission limit from 326 IAC 8 in pounds of VOC per gallon of coating;
D= Density of VOC in coating in pounds per gallon of VOC;
E= Equivalent emission limit in pounds of VOC per gallon of coating solids as applied.

(c) Actual solvent density shall be used to determine compliance of the surface coating operation using the compliance methods in 326 IAC 8-1-2 (a).

The pounds of VOC per gallon of coating solids shall be limited to less than 4.50 pounds VOC per gallon of coating solids at Presses #1 and #3.

(d) Pursuant to 326 IAC 8-1-2(c) the overall control efficiency of the catalytic oxidizers for Presses #1 and #3 shall be no less than the equivalent overall efficiency calculated by the following equation:

$$O = \frac{V - E}{V} \times 100$$

Where:

V = The actual VOC content of the coating or, if multiple coatings are used, the daily weighted average VOC content of all coatings, as applied to the subject coating line as determined by the applicable test methods and procedures specified in 326 IAC 8-1-4 in units of pounds of VOC per gallon of coating solids as applied.
E = Equivalent emission limit in pounds of VOC per gallon of coating solids as applied.
O = Equivalent overall efficiency of the capture system and control device as a percentage.

The overall efficiency of the catalytic oxidizers shall be greater than 46.5%.

Comment 2:

Page 32 of 34, FESOP Quarterly Report Form:

Where it says “Limit: 99.0 per twelve...” change to “99.0 tons per twelve...”

Response 2:

The Limit on the Quarterly Report Form is revised as follows:

Limit: 99.0 **tons** per twelve (12) consecutive month period**, total,** with compliance determined at the end of each month, based on the following equation:

VOC emitted (tons) = [VOC input at Presses #1 and #3 (tons) X 0.80 flash off x (0.29 emitted after control)] + [VOC input at Press #2 (tons) X 0.05 flash off] + [VOC usage from all cleaners and solvents (tons)]

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD)
for a Federally Enforceable State Operating Permit (FESOP)

Source Background and Description

Source Name:	**Mignone Communications, Inc.**
Source Location:	**880 East State Street, Huntington, Indiana 46750**
County:	**Huntington**
SIC Code:	**2752**
Operation Permit No.:	**F 069-16460-00059**
Permit Reviewer:	**CarrieAnn Paukowits**

The Office of Air Quality (OAQ) has reviewed a FESOP application from Mignone Communications, Inc., relating to the operation of a commercial printing source.

This permit contains provisions intended to satisfy the requirements of the construction permit rules.

Source Definition

This commercial printing source consists of a source with an on-site contractor:

(a) Print Support, Inc., the supporting operation, is located at 860 East State Street, Huntington, Indiana 46750; and

(b) Mignone Communications, Inc., the primary operation, is located at 880 East State Street, Huntington, Indiana 46750.

This determination was originally made for MSOP 069-14670-00059, issued on November 12, 2001, and is still true:

Although, the two (2) companies have separate addresses, they are located in the same building. Therefore, Print Support, Inc. and Mignone Communications, Inc. are located on contiguous properties. Print Support, Inc. and Mignone Communications, Inc. have the same SIC code and the majority of product from one source is input to the other for further processing. In addition, the President of Print Support, Inc. is the Controller of Mignone Communications, Inc. and the Vice President of Print Support, Inc. is also the Vice President of Mignone Communications, Inc. Therefore, although no third party owns more than fifty percent (50%) of both Print Support and Mignone Communications, officers of both companies are directly involved with the day to day operations of both companies. Therefore, IDEM has determined that the two (2) companies, Print Support, Inc. and Mignone Communications, Inc., are under common control, and the two (2) entities are considered a single source pursuant to 326 IAC 1-2-73, “Source” definition, and 326 IAC 2-7-1, definition of Major Source. Therefore, the term “source” in the permit and supporting documents refers to both Mignone Communications, Inc. and Print Support, Inc. as one (1) source.

For simplicity, the applicant requested that the source name Mignone Communications, Inc., be used for the combination of the two (2) companies for the purposes of this approval.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

(a) One (1) five-color heatset lithographic web press, identified as Press #1, constructed in 1998, equipped with a 2.5 million British thermal units per hour catalytic oxidizer for VOC control, exhausting to Stack 1, capacity: 1,400 feet per minute.

(b) One (1) natural gas-fired dryer, identified as Dryer on Press #1, constructed in 1998, rated at 2.422 million British thermal units per hour.

(c) One (1) five-color non-heatset lithographic web press, identified as Press #2 and operated by Print Support, Inc., constructed in 2001, capacity: 2,844 feet per minute.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during this review process.

New Emission Units and Pollution Control Equipment Receiving Prior Approval

The application includes information relating to the prior approval for the construction and operation of the following equipment pursuant to 326 IAC 2-8-4(11):

(d) One (1) five-color heatset lithographic web press, identified as Press #3, equipped with a 2.5 million British thermal units per hour catalytic oxidizer for VOC control, exhausting to Stack 2, capacity: 1,500 feet per minute.

(e) One (1) natural gas-fired dryer, identified as Dryer on Press #3, rated at 2.422 million British thermal units per hour.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

(a) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device, such as a bag filter or cyclone, including bindery and finish trimmers, capacity: 25,848 feet per hour. [326 IAC 6-3-2]

(b) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour, including one (1) natural gas comfort heater rated at 0.1309 million British thermal units per hour, and the combustion from the dryers and incinerators listed as significant.

(c) One (1) small label press (one (1) ink jet printer), with negligible VOC emissions.

(d) Pre-press operations, including plate processing and film developing with negligible VOC emissions.

(e) One (1) bailer.

Existing Approvals

The source has constructed and has been operating under the following previous approvals including:

MSOP 069-14670-00059, issued on November 12, 2001.

All terms and conditions from previous approvals issued pursuant to the permitting programs approved into the State Implementation Plan have been either incorporated as originally stated, revised, or deleted by this permit. All previous approvals are superseded by this permit.

(a) The following terms and conditions from previous approvals have been revised in this permit:

MSOP 069-14670-00059, issued on November 12, 2001

Condition D.1.1:

(1) Pursuant to 326 IAC 8-2-5 (Paper Coating Operations), the amount of volatile organic compound (VOC) discharged to the atmosphere shall not exceed thirty-five hundredths (0.35) kilograms per liter of coating (two and nine tenths 2.9 pounds per gallon), excluding water, from the one (1) heatset web lithographic printing press.

In order to comply with this VOC limit, the catalytic oxidizer shall operate at all times that the printing press (ID No. 1) and the 2.422 MMBtu per hour dryer for the press are in operation and shall maintain a minimum overall control efficiency of 49.6%.

(2) Based upon 326 IAC 8-1-2(c) and the overall minimum control efficiency of 49.6%, the VOC content of the coating shall not exceed 9.51 pounds per gallon of coating solids delivered to the applicator.

Reason revised:

Based on current actual solvent density, the pounds of VOC per gallon of coating solids shall be limited to less than 4.50 pounds VOC per gallon of coating solids at Presses #1 and #3. The overall efficiency of the catalytic oxidizers shall be greater than 46.5%.

(b) The following terms and conditions from previous approvals have been determined to be no longer applicable, and, therefore, are not incorporated into this permit:

All construction conditions from all previous permits.

Reason not incorporated: All facilities previously permitted have already been constructed. Therefore, the construction conditions are no longer necessary as part of the operating permit. Any facilities that were previously permitted but have not yet been constructed would need new pre-construction approval before beginning construction.

Stack Summary

There is one (1) proposed new stack at this source:

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (EF)
Stack 2	Press #3, Catalytic Oxidizer	32.0	1.67	2,000	650-1,000

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the FESOP be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete FESOP application for the purposes of this review was received on November 14, 2002. Additional information was received on May 2, 19 and 28, 2003.

There was no notice of completeness letter mailed to the source.

Emission Calculations

See pages 1 through 4 of Appendix A of this document for detailed emissions calculations.

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit (PTE) is defined as "the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA."

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	13.8
PM_{10}	14.1
SO_2	0.026
VOC	269
CO	3.67
NO_X	4.37

Note: For the purpose of determining Title V applicability for particulates, PM_{10}, not PM, is the

regulated pollutant in consideration.

HAPs	Potential To Emit (tons/year)
Benzene	negligible
Dichlorobenzene	negligible
Formaldehyde	0.003
Hexane	0.079
Toluene	negligible
Lead	negligible
Cadmium	negligible
Chromium	negligible
Manganese	negligible
Nickel	negligible
Xylenes	2.51
Glycol Ethers	3.70
Cumene	1.88
TOTAL	8.17

(a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of VOC is equal to or greater than one hundred (100) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

(b) Fugitive Emissions

Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset applicability.

(c) This source, otherwise required to obtain a Title V permit, has agreed to accept a permit with federally enforceable limits that restrict its PTE to below the Title V emission levels. Therefore, this source will be issued a Federally Enforceable State Operating Permit (FESOP), pursuant to 326 IAC 2-8.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 2001 OAQ emission data.

Pollutant	Actual Emissions (tons/year)
PM	-
PM_{10}	-
SO_2	-
VOC	0.62
CO	-
NO_X	-
HAP	-

Potential to Emit After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Federally Enforceable State Operating Permit.

	Limited Potential to Emit (tons/year)						
Process/facility	**PM**	**PM_{10}**	**SO_2**	**VOC**	**CO**	**NO_X**	**HAPs**
Three (3) printing presses (Press #1, Press #2 and Press #3)	-	-	-	less than 99.0	-	-	3.70 individual; 8.09 total
Insignificant Activities, including combustion from dryers and oxidizers	13.8	14.1	0.026	1.00	3.67	4.37	0.082
Total Emissions	13.8	14.1	0.026	less than 100	3.67	4.37	Single <10 Total <25

County Attainment Status

The source is located in Huntington County.

Pollutant	Status
PM_{10}	Attainment
SO_2	Attainment
NO_2	Attainment
Ozone	Attainment
CO	Attainment
Lead	Attainment

(a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore,

VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Huntington County has been designated as attainment or unclassifiable for ozone.

(b) Huntington County has been classified as attainment or unclassifiable for all remaining criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

Federal Rule Applicability

(a) This source is not required to obtain a Part 70 Operating Permit because this source has agreed to accept a permit with federally enforceable limits that restrict its PTE to below the Title V emission levels . Therefore, the requirements of 40 CFR 64, Compliance Assurance Monitoring, are not applicable.

(b) This source is not subject to the requirements of 40 CFR 60, Subpart QQ, Standards of Performance for the Graphics Arts Industry: Publication Rotogravure Printing, because the printing presses are lithographic printing presses, not rotogravure printing presses.

(c) This source is not subject to the requirements of 40 CFR 60, Subpart FFF, Standards of Performance for Flexible Vinyl and Urethane Coating and Printing, because this source is not a rotogravure printing line.

(d) This source applies coatings to paper. Therefore, the requirements of 40 CFR 60, Subpart VVV, Standards of Performance for Polymeric Coating of Supporting Substrates Facilities, are not applicable.

(e) This source is not a publication rotogravure, product and packaging rotogravure, or wide-web flexographic printing press. Therefore, the requirements of 40 CFR 63, Subpart KK, National Emission Standards for the Printing and Publishing Industry, do not apply.

(f) This source performs only lithographic web printing. Therefore, pursuant to 40 CFR 63.3300(c), this source is not subject to the requirements of 40 CFR 63, Subpart JJJJ, National Emission Standards for Hazardous Air Pollutants: Paper and Other Web Coating.

State Rule Applicability - Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration (PSD))

The potential VOC emissions from this source, constructed after August 7, 1977, are greater than 250 tons per year after construction of the one (1) proposed five-color heatset lithographic web press (Press #3). The potential to emit VOC is limited to less than 100 tons per year to satisfy the requirements of 326 IAC 2-8-4, FESOP. That limitation will also make this source a minor source pursuant to 326 IAC 2-2, PSD.

326 IAC 2-6 (Emission Reporting)

This source is located in Huntington County and the potential to emit VOC is limited to less than one hundred (100) tons per year. Therefore, 326 IAC 2-6 does not apply.

326 IAC 2-8-4 (FESOP)

Pursuant to this rule, the amount of VOC shall be limited to less than one hundred (100) tons per

year. Therefore, the requirements of 326 IAC 2-7, do not apply.

This source shall limit the potential to emit VOC from the total of the three (3) presses (Press #1, Press #2 and Press #3) to less than 99.0 tons per year. This limit shall be achieved by limiting the VOC delivered to the applicators at the presses, such that the potential to emit VOC from those facilities shall be less than 99.0 tons per twelve (12) consecutive month period, with compliance determined at the end of each month, and limiting the overall control efficiency of the catalytic oxidizers to no less than seventy-one percent (71%). The unrestricted potential to emit VOC from all insignificant activities, including combustion from the dryers is no more than 1.00 ton per year. Therefore, the potential to emit VOC from the entire source is limited to less than 100 tons per year. The potential to emit VOC from the three (3) presses will be based on the following equation:

VOC emitted (tons) = [VOC input at Presses #1 and #3 (tons) X 80% flash off x (100 - 71% overall control efficiency)] + [VOC input at Press #2 (tons) X 5% flash off] + [VOC usage from all cleaners and solvents (tons)]

326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity limitations), except as provided in 326 IAC 5-1-3 (Temporary alternative opacity limitations), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR Part 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

State Rule Applicability - Individual Facilities

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)

The allowable particulate emission rate from trimmers shall not exceed 3.14 pounds per hour when operating at a process weight rate of 1,340 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

326 IAC 8-1-6 (New Facilities, General Reduction Requirements)

This rule applies to new facilities as of January 1, 1980, that have potential VOC emissions of 25 tons per year or greater if no specific rule in article 8 is applicable. Since the requirements of 326 IAC 8-2-5 (Paper Coating Operations) are applicable to the printing presses, the requirements of 326 IAC 8-1-6 are not applicable.

326 IAC 8-2-5 (Paper Coating Operations)

This source consists of web coating presses in which one hundred percent (100%) of the paper is coated. Therefore, the three (3) presses (Press #1, Press #2 and Press #3) are subject to the requirements of 326 IAC 8-2-5. Pursuant to this rule, the amount of volatile organic compound (VOC) discharged to the atmosphere shall not exceed thirty-five hundredths (0.35) kilograms per liter of coating (two and nine tenths (2.9) pounds per gallon), excluding water, from the printing presses. The presses will comply with this rule as follows:

(a) The worst case coating that will be used at Presses #1 and #3 contains 4.05 pounds of VOC per gallon of coating less water, which exceeds the limit of 2.9 pounds of VOC per gallon of coating less water. However, the source will use a catalytic oxidizer to control VOC emissions in order to achieve this emission limitation. Pursuant to 326 IAC 8-1-2(b), for surface coating operations using one of the compliance methods under 326 IAC 8-1-2(a), which in this case, is the use of the catalytic oxidizer, the equivalent emission limit in pounds of VOC per gallon of coating solids is determined using the following equation:

$$E = L / (1 - L / D)$$

where: L = Applicable emission limit in pounds of VOC per gallon of coating
= 2.9 pounds VOC per gallon of coating less water
D = Density of VOC in coating in pounds per gallon of VOC.
= 8.16 pounds of VOC per gallon of coating (from 326 IAC 8-1-2(b))
E = Equivalent emission limit in pounds of VOC per gallon of coating solids as applied
= 4.50 pounds VOC per gallon of coating solids

Pursuant to 326 IAC 8-1-2(c), the equivalent overall control efficiency of the capture system and control device, as a percentage, needed in order to meet the emission limitation is determined by the following equation:

$$O = (V - E)/V \times 100$$

where: V = The actual VOC content of the coating in pounds of VOC per gallon of coating solids as applied
= 8.41 pounds VOC per gallon of coating solids
E = 4.50 pounds VOC per gallon of coating solids
O = Equivalent overall control efficiency of the capture system and control device as a percentage
= 46.5%

The VOC capture system for the printing presses each has a capture efficiency of 75%. The catalytic oxidizers destruction efficiencies are 95%. This is equivalent to an overall control efficiency of 71.25%. Therefore, Press #1 and Press #3 are in compliance with the emission limit of 2.9 pounds VOC per gallon of coating less water under 326 IAC 8-2-5, since the catalytic oxidizer has an overall control efficiency which exceeds the required control efficiency of 46.5%.

(b) The worst case coating that will be used at the one (1) non-heatset offset lithographic printing press (Press #2) has a VOC content of 1.65 pounds VOC per gallon of coating less water. This is less than 2.9 pounds of VOC per gallon of coating less water. Therefore, Press #2 will comply with this rule.

326 IAC 8-5-5 (Miscellaneous Operations: Graphic Arts Operations)

The printing presses at this source are not packaging rotogravure, publication rotogravure or flexographic printing presses. Therefore, the requirements of 326 IAC 8-5-5 are not applicable.

Testing Requirements

(a) Pursuant to MSOP 069-14670-00059, issued on November 12, 2001, during the period between June 15, 2004 and December 15, 2005, the Permittee shall perform VOC and operating temperature testing utilizing Methods 25 (40 CFR 60, Appendix A) for VOC or other methods as approved by the Commissioner, in order to demonstrate compliance with the VOC content and emission limitations in the FESOP for the catalytic oxidizer controlling Press #1. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration.

(b) Within one hundred and eighty (180) days after initial startup, the Permittee shall perform VOC and operating temperature testing utilizing Methods 25 (40 CFR 60, Appendix A) for VOC or other methods as approved by the Commissioner, in order to demonstrate compliance with the VOC content and emission limitations in the FESOP for the catalytic oxidizer controlling Press #3. This test shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration.

Compliance Requirements

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

The two (2) five-color heatset lithographic web presses, identified as Presses #1 and #3, have applicable compliance monitoring conditions as specified below:

(a) A continuous monitoring system shall be calibrated, maintained, and operated on the catalytic oxidizer controlling emissions from Press #1 for measuring operating temperature. The output of this system shall be recorded as an hourly average. The Permittee shall take appropriate response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports whenever the hourly average temperature of the catalytic oxidizer is below 642EF. The temperature correlates to an overall VOC control efficiency of 98% based on the stack capture and destruction efficiency test

conducted on June 15, 1999. An hourly average temperature that is below 642EF is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

(b) A continuous monitoring system shall be calibrated, maintained, and operated on the catalytic oxidizer controlling emissions from Press #3 for measuring operating temperature. The output of this system shall be recorded as an hourly average. From the date of issuance of this permit until the approved stack test results are available, the Permittee shall take appropriate response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports whenever the hourly average temperature of the catalytic oxidizer is below 1,400EF. An hourly average temperature that is below 1,400EF is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

(c) The Permittee shall determine the hourly average temperature from the most recent valid stack test that demonstrates compliance with limits of this FESOP, as approved by IDEM.

(d) On and after the date the approved stack test results are available, the Permittee shall take appropriate response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports whenever the hourly average temperature of the catalytic oxidizer is below the hourly average temperature as observed during the compliant stack test. An hourly average temperature that is below the hourly average temperature as observed during the compliant stack test is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

(e) The Permittee shall determine fan amperage or duct pressure from the most recent valid stack tests that demonstrate compliance with limits of this FESOP, as approved by IDEM.

(f) The duct pressure or fan amperage shall be observed at least once per day for each catalytic oxidizer when a catalytic oxidizer is in operation. When for any one reading, the duct pressure or fan amperage is outside the normal range as established in most recent compliant stack test, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports. A reading that is outside the range as established in the most recent compliant stack test is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

These monitoring conditions are necessary because the catalytic oxidizers must operate properly to ensure compliance with 326 IAC 8-2-5 (Paper Coating Operations) and 326 IAC 2-8 (FESOP), and so that the source remains a minor source pursuant to 326 IAC 2-2 (PSD).

Conclusion

The construction of the one (1) proposed five-color heatset lithographic web press (Press #3) and the operation of this stationary commercial printing source shall be subject to the conditions of the attached proposed FESOP No.: F 069-16460-00059.

Appendix A: Emissions Calculations
VOC From Printing Press Operations

Company Name: Mignone Communications, Inc.
Address City IN Zip: 880 East State Street, Huntington, Indiana 46750
FESOP: 069-16460
Plt ID: 069-00059
Reviewer: CarrieAnn Paukowits
Date: November 14, 2002

THROUGHPUT			
Press I.D.	MAXIMUM LINE SPEED (FEET/MIN)	MAXIMUM PRINT WIDTH (INCHES)	MMin^2/YEAR
Press #1	1400	38.0	335543

INK VOCS							
Ink Name / Press Id	Maxium Coverage '(lbs/MMin^2)	Weight % Volatiles*	Flash Off %	Throughput (MMin^2/Year)	Emissions (tons/year)	Control Efficiency	Emissions after Control (tons/year)
Process Yellow	1.00	49.65%	80.0%	335543	66.6	**71.25%**	19.2
Process Magenta	1.00	44.5%	80.0%	335543	59.7	**71.25%**	17.2
Process Cyan	1.00	45.18%	80.0%	335543	60.6	**71.25%**	17.4
Process Black	1.00	39.7%	80.0%	335543	53.3	**71.25%**	15.3
Hi Gloss O/P Varnish	0.300	45.0%	100%	335543	22.6	**71.25%**	6.51
Fountain Solution	0.130	22.53%	100%	335543	4.91	**71.25%**	1.41
Blanket Wash	0.0900	99.9%	100%	335543	15.1	**0.00%**	15.1
				Total VOC Emissions =	**109**		**42.2**

THROUGHPUT			
Press I.D.	MAXIMUM LINE SPEED (FEET/MIN)	MAXIMUM PRINT WIDTH (INCHES)	MMin^2/YEAR
Press #2	2844	35.0	627764

INK VOCS							
Ink Name / Press Id	Maxium Coverage '(lbs/MMin^2)	Weight % Volatiles*	Flash Off %	Throughput (MMin^2/Year)	Emissions (tons/year)	Control Efficiency	Emissions after Control (tons/year)
NHNP Onyx Black	3.50	20.0%	5.00%	627764	11.0	**0.00%**	11.0
Fountain Solution	0.120	0.00%	100%	627764	0.00	**0.00%**	0.0
Blanket Wash	0.100	100%	100%	627764	31.4	**0.00%**	31.4
				Total VOC Emissions =	**42.4**		**42.4**

THROUGHPUT			
Press I.D.	MAXIMUM LINE SPEED (FEET/MIN)	MAXIMUM PRINT WIDTH (INCHES)	MMin^2/YEAR
Press #3	1500	38.0	359510

INK VOCS							
Ink Name / Press Id	Maxium Coverage '(lbs/MMin^2)	Weight % Volatiles*	Flash Off %	Throughput (MMin^2/Year)	Emissions (tons/year)	Control Efficiency	Emissions after Control (tons/year)
Process Yellow	1.00	49.65%	80.0%	359510	71.4	**71.25%**	20.5
Process Magenta	1.00	44.5%	80.0%	359510	64.0	**71.25%**	18.4
Process Cyan	1.00	45.18%	80.0%	359510	65.0	**71.25%**	18.7
Process Black	1.00	39.7%	80.0%	359510	57.1	**71.25%**	16.4
Hi Gloss O/P Varnish	0.300	45.0%	100%	359510	24.3	**71.25%**	6.98
Fountain Solution	0.130	22.53%	100%	359510	5.26	**71.25%**	1.51
Blanket Wash	0.0900	99.9%	100%	359510	16.2	**0.00%**	16.2
				Total VOC Emissions =	**117**		**45.2**

*VOC (Tons/Year) = Maximum Coverage pounds per MMin^2 * Weight % volatiles (weight % of water & organics - weight % of water = weight % organics) * Flash off * Throughput * 1 Ton per 2000 pounds

METHODOLOGY

Throughput = Maxium line speed feet per minute * Convert feet to inches * Maximum print width inches * 60 minutes per hour * 8760 hours per year = MMin^2 per Year
VOC = Maximum Coverage pounds per MMin^2 * Weight percentage volatiles (water minus organics) * Flash off * Throughput * Tons per 2000 pounds = Tons per Year
NOTE: HEAT SET OFFSET PRINTING HAS AN ASSUMED FLASH OFF OF 80% and NON-HEATSET OFFSET LITHOGRAPHIC PRINTING HAS AN ASSUMED FLASH OFF OF 5%.
OTHER TYPES OF PRINTERS HAVE A FLASH OFF OF 100%.
(Source -OAQPS Draft Guidance, "Control of Volatile Organic Compound Emisions from Offset Lithographic Printing (9/93))

Appendix A: Emission Calculations
HAP Emission Calculations

Company Name: Mignone Communications, Inc.
Address City IN Zip: 880 East State Street, Huntington, Indiana 46750
FESOP: 069-16460
Plt ID: 069-00059
Reviewer: CarrieAnn Paukowits
Date: November 14, 2002

Material	Density (lbs/gal)	Gallons of Material '(lbs/MMin^2)	Maximum (MMin^2/Year)	Weight % Xylene	Weight % Glycol Ethers	Weight % Cumene	Xylene Emissions (tons/yr)	Glycol Ether Emissions (tons/yr)	Cumene Emissions (tons/yr)
Press #1									
Fountain Solution	8.70	0.13000	335543	0.00%	8.20%	0.00%	0.00	1.79	0.00
Blanket and Roller Wash	6.69	0.09000	335543	4.00%	0.00%	3.00%	0.60	0.00	0.45
Press #2									
Fountain Solution	8.87	0.12000	627764	0.00%	0.00%	0.00%	0.00	0.00	0.00
Blanket and Roller Wash	6.69	0.10000	627764	4.00%	0.00%	3.00%	1.26	0.00	0.94
Press #3									
Fountain Solution	8.70	0.13000	359510	0.00%	8.20%	0.00%	0.00	1.92	0.00
Blanket and Roller Wash	6.69	0.09000	359510	4.00%	0.00%	3.00%	0.65	0.00	0.49
							2.51	**3.70**	**1.88**
								Overall Total	**8.09**

METHODOLOGY

HAPS emission rate (tons/yr) = Density (lbs/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100

Company Name: Mignone Communications, Inc.
Address City IN Zip: 880 East State Street, Huntington, Indiana 46750
FESOP: 069-16460
Plt ID: 069-00059
Reviewer: CarrieAnn Paukowits
Date: November 14, 2002

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr	
9.975	87.4	Two (2) dryers rated at 2.422 MMBtu/hr, each. Two (2) catalytic oxidizers rated at 2.5 MMBtu/hr, each One (1) comfort heater rated at 0.1309 MMBtu/hr

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.90	7.60	0.600	100 **see below	5.50	84.0
Potential Emission in tons/yr	0.083	0.332	0.026	4.37	0.240	3.67

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.
**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton
See page 4 for HAPs emissions calculations.

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
HAPs Emissions

Company Name: Mignone Communications, Inc.
Address City IN Zip: 880 East State Street, Huntington, Indiana 46750
FESOP: 069-16460
Plt ID: 069-00059
Reviewer: CarrieAnn Paukowits
Date: November 14, 2002

HAPs - Organics

	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	9.17E-05	5.24E-05	3.28E-03	7.86E-02	1.49E-04

HAPs - Metals

	Lead	Cadmium	Chromium	Manganese	Nickel	Total HAPs
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03	
Potential Emission in tons/yr	2.18E-05	4.81E-05	6.12E-05	1.66E-05	9.17E-05	0.082

Methodology is the same as page 3.

The five highest organic and metal HAPs emission factors are provided above.
Additional HAPs emission factors are available in AP-42, Chapter 1.4.